

**SEP 25 2014** 

**Brad Cornelsen** 

Council Bluffs, IA 51503

RE: Pre-MUR 579

Dear Mr. Cornelsen:

The Federal Election Commission (the "Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended (the "Act"), has received information in the normal course of carrying out its supervisory responsibilities indicating that you may have violated provisions of the Act. Notification of this matter is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

Specifically, it has come to our attention that, in your former position as Chief Financial Officer of MV Transportation, Inc. ("MV"), you may have maintained, organized, or participated in an arrangement in which MV reimbursed its former Chief Executive Officer, R. Carter Pate ("Pate"), \$43,100 for six federal campaign contributions. The contributions took place between August 24, 2011 and September 27, 2013, as follows:

Candidate	Committee	Amount	Date
Rick Perry	RickPerry.org	\$ 5,000	8/24/2011
John Mica	Mica for Congress	\$ 5,000	12/5/2011
Pete Sessions	Pete Sessions for Congress	\$ 5,000	4/24/2012
Eric Cantor	Cantor for Congress	\$ 500	6/12/2012
Mitt Romney	Mitt Romney Victory	\$25,000	9/10/2012
Pete Sessions	Pet Sessions for Congress	\$ 2,600	9/27/2013

The Office of General Counsel is reviewing this information to determine whether to recommend to the Commission that there is reason to believe you may have violated provisions of the Act including, but not limited to 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) by consenting as an officer to making contributions from an incorporated entity, and 52 U.S.C. § 30122 (formerly 2 U.S.C. § 441f) by making or effecting contributions in the name of another.

A "reason to believe" finding is not a finding that any person violated the Act; rather, it means only that the Commission believes a violation may have occurred. In the event the Commission finds that there is reason to believe, it may authorize the Office of General Counsel to conduct an investigation to determine whether, in fact, a violation occurred or to assess the scope of the alleged violation. See 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)).

Before we make a recommendation to the Commission, we offer you the opportunity to provide a response in writing. Should you choose to respond, you may also submit any materials — including documents or affidavits from persons with relevant knowledge — that you believe may be relevant or useful to the Commission's consideration of this matter. The Commission will take into account any additional information you provide in determining whether to find reason to believe that you violated the Act or Commission regulations.

Your response, if you choose to make one, must be submitted in writing within 15 days of this letter's receipt. After 15 days, we will make our recommendations to the Commission. The Commission will then consider the recommendations and take appropriate action.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) (formerly 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A)), unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by legal counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

Any correspondence sent to the Commission must be addressed as follows and should reference Pre-MUR 579:

<u>Mail</u>

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau
999 E Street, NW
Washington, DC 20436

<u>Email</u>

mdebeau@fec.gov

If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

Jeff S. Jordan

Assistant General Counsel Complaints Examination & Legal Administration